

STATE OF OKLAHOMA            )  
  )  
COUNTY OF OKLAHOMA        )        ss

AFFIDAVIT OF CHRISTINA HAILEY

I, Christina Hailey, being first duly sworn, hereby affirm and state as follows:

1. In December of 2020 and January of 2021, I was employed as a medical security officer at the Oklahoma County Detention Center ("OCDC"). My assigned shift was 2:00 p.m. to 10:30 p.m.

2. As a medical security officer, I escorted the medical staff around the OCDC to evaluate and treat inmates.

3. In December of 2020 and January of 2021, I interacted with Brown on numerous occasions while performing my duties as a medical security officer, because Brown had a tracheotomy tube that required cleaning twice a day.

4. During my interactions with Mr. Brown, he was always nice and polite. He responded to staff with "yes, ma'am, or no ma'am." He did not act aggressively or appear to be violent.

5. I worked my normal shift on January 2, 2021. At approximately 3:30 on January 2, 2021, I observed Brown while he was in the medical clinic, and Brown appeared to be his normal self. I did not observe Brown engage in any unusual or aggressive behavior.

6. Several hours later, at approximately 6:52 p.m., I escorted a nurse to 13 David, cell 18, for a detox check. While there, I did not hear any screaming or sounds of a fight. No one said anything to me about a fight or reported that an inmate needed help.

7. I left 13 David at approximately 6:53 and went to 13 Adam. At approximately 6:58 p.m., nursing staff and I completed the detox checks and returned to the clinic.

8. While completing paperwork in the clinic, Corporal Melissa Wood radioed for assistance. Therefore, two nurses and I responded to 13 David at approximately 7:06 p.m.

9. When I arrived at 13 David, cell 11, I observed Brown hitting the door with something metal. He was not behaving in the polite and calm manner that I observed earlier that afternoon when Brown was in the medical clinic. Brown appeared to be under the influence of something.

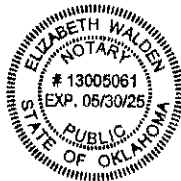
10. I stood back while other detention officers retrained Brown and helped cover the windows of the other jail cells. I escorted Lane's body to the medical clinic and stayed with him until the medical examiner arrived.

11. I have reviewed four photos taken from the jail video of 13 David on January 2, 2021, timestamped at 6:52:27; 6:52:37 p.m.; 6:53:02 p.m.; and 7:06:51 p.m., and I have identified myself in all four photos. Copies of the photos are attached as Exhibits A, B, C, and D.

FURTHER AFFIANT SAYETH NOT.

  
Christina Hailey

Subscribed and sworn to before me this 15<sup>th</sup> day of JULY 2024.



  
Notary Public



2021-Jan-02 06:53:02.789 PM (CST)



EXHIBIT 15

3th Floor David Pod 1 Large Side 1 (B205-00459)



2 06:52:37.289 PM (CST)



EXHIBIT 15

David Pod 1 Large Side 1 (B205-00459)



2 06:52:27.289 PM (CST)



EXHIBIT 15

David Pod 1 Large Side 1 (B205-00459)



2021-Jan-02 07:06:51.542 PM (CST)



EXHIBIT 15

3th Floor David Pod 1 Large Side 1 (B205-00459)